

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE  
WITNESS DAVID WILLIAMS  
TO TIME INC INTERROGATORIES  
(TI/USPS-T1-4 AND 5)**

The United States Postal Service hereby files the responses of witness David William to the above-listed interrogatories of Time, Inc. dated December 22, 2011. Each interrogatory is stated verbatim and followed by the response. Interrogatories TI/USPS-T1-1 through 3 have been redirected to the Postal Service for institutional responses, which are forthcoming.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
TO TIME INC INTERROGATORY**

**TI-USPS-T1-4.** Please confirm that when the Postal Service consolidates two mail processing facilities so that facility A takes over the functions previously performed by facility B, then facility A becomes the destinating SCF for all zones whose destinating SCF previously was facility B, and all delivery standards for mail entered at B are transferred to standards for the same mail entered at A.

**RESPONSE**

Confirmed with some caveats. When facility A takes over all of the destinating functions previously performed by facility B, then facility A becomes the SCF for all zones whose SCF previously was facility B. From a service standard perspective, when consolidation of two mail processing facilities occurs, the Postal Service applies the applicable service standard business rules as laid out in 39 CFR Part 121 – Service Standards for Market Dominant Mail Products to the realigned ZIP Code service area of the realigned facility. This has the effect of aligning the delivery standards of the two facilities.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
TO TIME INC INTERROGATORY**

**TI-USPS-T1-5.** Given the likelihood that some mailers who enter mail at destinating SCFs may modify their mailing practices in order to meet the revised critical dispatch times described in your testimony, what is your and the Postal Service's best estimate of the volumes of (i) First Class; and (ii) Periodicals mail that will qualify for overnight delivery after the proposed changes have been implemented?

**RESPONSE**

I am informed that the Postal Service currently has no estimates as to the extent some mailers may modify their mailing practices in order to meet the revised critical entry times described in my testimony.